

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOSE CALVENTE,

Plaintiff,

**DEFENDANT'S INITIAL  
NARRATIVE STATEMENT**

-against-

SUFFOLK COUNTY CORRECTIONAL FACILITY,

Defendants.

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**CV15-2024  
(JFB)(ARL)**

Defendant Suffolk County Correctional Facility submits the following as and for its initial narrative statement.

I. FACTS

Defendant intends to offer evidence of the following facts at trial:

- a) that plaintiff was not deprived of his right to adequate medical care; and
- b) that plaintiff did not sustain the injuries and damages which he claims.

II. EXHIBITS

Defendant intends to offer the following evidentiary items:

- a) plaintiff's medical chart from the Suffolk County Correctional Facility.
- b) plaintiff's medical chart from the New York State Department of Corrections.

III. WITNESSES

Defendant intends to call Dr. Vincent Geraci as a witness at trial.

Dated: Hauppauge, New York  
December 4, 2015

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